

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	:	Chapter 11
	:	
SERTA SIMMONS BEDDING, LLC, et al.,	:	Case No. 23-90020 (DRJ)
	:	
Debtors <sup>1</sup> ,	:	(Jointly Administered)
	:	
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SERTA SIMMONS BEDDING, LLC, et al.,	:	
	:	
Plaintiffs and Counterclaim Defendants,	:	
	:	
v.	:	
AG CENTRE STREET PARTNERSHIP L.P., et al.,	:	Adversary Proc. No. 23-09001 (DRJ)
	:	
Defendants, Counterclaim Plaintiffs and	:	
Third-Party Plaintiffs,	:	
	:	
v.	:	
AGF FLOATING RATE INCOME FUND, et al.,	:	
	:	
Third-Party Defendants.	:	
	:	
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**FIRST LIEN LENDER DEFENDANTS' INTERIM RESPONSE  
TO PLAINTIFFS' "EMERGENCY" MOTION (I)  
APPROVING PLAINTIFFS' PROPOSED DISCOVERY  
SCHEDULE, AND (II) LIMITING DEPOSITIONS, OR IN THE  
ALTERNATIVE, TO SCHEDULE A STATUS CONFERENCE**

Defendants, counterclaim plaintiffs and third-party plaintiffs AG Centre Street Partnership L.P., AG Credit Solutions Non-ECI Master Fund, L.P., AG Super Fund Master, L.P., AG SF

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Dawn Intermediate, LLC (6123); Serta Simmons Bedding, LLC (1874); Serta International Holdco, LLC (6101); National Bedding Company L.L.C. (0695); SSB Manufacturing Company (5743); The Simmons Manufacturing Co., LLC (0960); Dreamwell, Ltd. (2419); SSB Hospitality, LLC (2016); SSB Logistics, LLC (6691); Simmons Bedding Company, LLC (2552); Tuft & Needle, LLC (6215); Tomorrow Sleep LLC (0678); SSB Retail, LLC (9245); and World of Sleep Outlets, LLC (0957). The Debtors' corporate headquarters and service address for these chapter 11 cases is 2451 Industry Avenue, Doraville, Georgia 30360.

Master (L), L.P., and Silver Oak Capital, L.L.C., Contrarian Capital Fund I, L.P., Contrarian Distressed Debt Fund, L.P., and Contrarian Centre Street Partnership, L.P., Gamut Capital SSB, LLC, , Z Capital Credit Partners CLO 2018-1 Ltd. and Z Capital Credit Partners CLO 2019-1 Ltd., Shackleton 2013-III CLO, Ltd., Shackleton 2013-IV-R CLO, Ltd., Shackleton 2014-V-R CLO, Ltd., Shackleton 2015-VII-R CLO, Ltd., and Shackleton 2017-XI CLO, Ltd., North Star Debt Holdings, L.P., Ascribe III Investments, LLC, and Columbia Cent CLO 21 Limited, Columbia Cent CLO 27 Limited, Columbia Floating Rate Fund, a series of Columbia Funds Series Trust II, and Columbia Strategic Income Fund, a series of Columbia Funds Series Trust I (collectively, the “First Lien Lender Defendants”) hereby respectfully submit this interim response to (I) Plaintiffs’ “Emergency” Motion Approving Plaintiffs’ Proposed Discovery Schedule, and (II) Limiting Depositions, Or In the Alternative, To Schedule a Status Conference, dated April 17, 2023 (D.I. 164) (the “Motion”):

1. The First Lien Lender Defendants received Plaintiffs’ Motion at 8:28 PM CT on April 17, 2023, with no prior notice of the same. The First Lien Lender Defendants agree that a status conference on the scheduling and discovery issues outlined therein would be helpful. The First Lien Lender Defendants request a status conference at a time convenient to the Court on or after Thursday, April 20, 2023.

2. The First Lien Lender Defendants intend to file substantive response to the Motion no later than 5:00 PM CT on April 19, 2023.

Dated: April 18, 2023

**PORTER HEDGES LLP**

/s/ John F. Higgins

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2023, I caused to be served true and correct copies of the foregoing First Lien Lender Defendants' Interim Response to Plaintiffs' "Emergency" Motion (I) Approving Plaintiffs' Proposed Discovery Schedule, and (II) Limiting Depositions, Or In the Alternative, To Schedule a Status Conference, via ECF on all parties.

/s/ John F. Higgins

John F. Higgins